

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document relates to:

*Ashton et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(SN) (and member case *Marie Laure Anaya, et al. v. Islamic Republic of Iran*, 1:18-cv-12341 (GBD) (SN)))

**PLAINTIFFS' NOTICE OF MOTION FOR ENTRY OF PARTIAL FINAL DEFAULT  
JUDGMENTS FOR DAMAGES FOR ECONOMIC LOSSES FOR CERTAIN PLAINTIFFS**

(*ANAYA/IRAN V*)

PLEASE TAKE NOTICE that, by and through their undersigned counsel and upon the accompanying Memorandum of Law, the Declaration of Joseph Peter Drennan executed on March 2, 2023 (the “Drennan Declaration”), together with the Exhibits annexed thereto, and all prior pleadings and proceedings had herein, the *Anaya/Iran* Plaintiffs identified at **Exhibit A** to the Drennan Declaration (the “Movants”), each of whom represents the estate of an individual who was killed in the terrorist attacks on September 11, 2001, respectfully move this Court for an Order awarding:

- (1) each of the estates Movants represent, on behalf of all survivors and all legally entitled beneficiaries and family members of the decedent, an award of economic damages in the amount set forth in **Exhibit A** to the Drennan Declaration; and
- (2) prejudgment interest on the damages awarded to each of the estates Movants represent at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment; and
- (3) permission to Movants to seek punitive damages, or other appropriate damages for the estates they represent at a later date; and

- (4) permission for all other *Anaya/Iran* Plaintiffs to submit applications for damages awards in later stages, to the extent such awards have not previously been addressed; and
- (5) such other and further relief to Movants as this Honorable Court deems just and proper.

Movants' request is made in connection with the judgment on default as to liability entered against the Islamic Republic of Iran on October 5, 2021 (ECF 70 in 18-cv-12341 and ECF 7178 in 03-MDL-1570).

Dated: March 2, 2023  
White Plains, New York

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